

[Submitting counsel below]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

No. 3:23-md-03084-CRB

**STIPULATION REGARDING
STIPULATED AND [PROPOSED]
PRETRIAL ORDER NO. __: FEDERAL
RULE OF EVIDENCE 502(D) AND
PRIVILEGED MATERIALS**

This Document Relates to:

ALL ACTIONS

WHEREAS, on March 28, 2024, the Court entered a Privileged Materials Order ruling on the Parties' proposals and disputes regarding how privileged materials will be handled in this multi-district litigation. (ECF No. 366)

WHEREAS, the Court's order required the Parties to incorporate the Court's rulings into a "final Stipulated and [Proposed] Pretrial Order No. __: Federal Rule of Evidence 502(d) and Privileged Materials that shall be filed with the Court by April 3, 2024."

WHEREAS the Parties have complied with this order by drafting and submitting the stipulated and proposed order filed herewith. The Parties have made three non-substantive edits based on what the Parties agree was the Court's intent (specifically: "work product production"

1 changed to “work product protection” in paragraph 19; “addresses” changed to “addressees” in
2 paragraph 19(d); and “A Receiving Party make seek...” changed to “A Receiving Party may
3 seek...” in paragraph 19).

4 **THEREFORE**, the Parties respectfully request the Court enter the Parties’ proposed order,
5 filed herewith.

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7 **IT IS SO STIPULATED.**

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9 Dated: April 3, 2024

Respectfully Submitted:

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FILER'S ATTESTATION

I, Michael B. Shortnacy, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

Dated: April 3, 2024

By: /s/ Michael B. Shortnacy
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